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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re

THE ROMAN CATHOLIC ARCHBISHOP
OF SAN FRANCISCO,

Debtor.

Case No. 23-30564

Chapter 11

**COUNTER-DESIGNATION OF THE
RECORD AND STATEMENT OF THE
ISSUE FILED BY APPELLEE THE
OFFICIAL COMMITTEE OF
UNSECURED CREDITORS**

Pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure, Appellee, the Official Committee of Unsecured Creditors (the “Committee” or “Appellee”) of The Roman Catholic Archbishop of San Francisco (the “Debtor”) hereby: (1) submits the following statement of issue to be considered on appeal, and (2) designates the following additional items to be included in the record for the appeals filed by Chicago Insurance Company, Fireman’s Fund Insurance Company, Westport Insurance Corporation f/k/a Employers Reinsurance Corporation, and Appalachian Insurance Company (the “Appellant”).¹

¹ The Appellant filed two notices of appeal regarding the Court’s approval of the Debtor’s Motion to Approve Compromise and Stipulation Modifying the Automatic Stay (the “Motion”): Docket Nos. 1343 and 1375.

I. Statement of Issue to be Presented on Appeal

Appellee presents the following statement of issue to be considered on appeal:

1. Did the bankruptcy court abuse its discretion in granting the compromise between the Debtor, the Committee, and certain child sexual abuse survivors to stay thirty-nine state court cases in exchange for allowing five cases to move forward and permission to submit individual case demands for the Debtor to convey to its insurers?

II. Designation of Additional Items to be Included in the Record on Appeal

Appellee designates the following additional items to be included in the record on appeal, including all exhibits, appendices, and/or addenda:

Items from Main Bankruptcy Case, Case No. 23-30564

Item No.	Filing Date	Docket No.	Description
1	10/19/2023	220	Motion for Order (1) Fixing Time for Proofs of Claim; (2) Approving Proof of Claim Forms; (3) Providing Confidential Protocols; And (4) Approving Form and Manner of Notice
2	10/27/2023	251	Motion for Relief from Stay
3	11/02/2023	273	Committee's Limited Objection to Debtor's Motion for Order (1) Fixing Time for Proofs of Claim; (2) Approving Proof of Claim Forms; (3) Providing Confidential Protocols; And (4) Approving Form and Manner of Notice
4	11/02/2023	274	Certain Insurers' Limited Objection and Reservation of Rights to Debtor's Motion for Order (1) Fixing Time for Proofs of Claim; (2) Approving Proof of Claim Forms; (3) Providing Confidential Protocols; And (4) Approving Form and Manner of Notice
5	11/16/2023	313	Objection to Motion of Certain Insurers for Relief from Automatic Stay to Permit California Coverage Action to Continue

6	11/21/2023	337	Order: (1) Fixing Time for Filing Proofs of Claim; (2) Approving Proof of Claim Forms; (3) Providing Confidential Protocols; and (4) Approving Form and Manner of Notice
7	02/07/2024	452	Stipulation to Withdraw without Prejudice the Motion of Certain Insurers for Relief from Automatic Stay to Permit California Coverage Action to Continue
8	02/07/2024	453	Order Approving Stipulation to Withdraw without Prejudice the Motion of Certain Insurers for Relief from Automatic Stay to Permit California Coverage Action to Continue
9	04/02/2024	571	Ex Parte Motion to Compel Production of Documents Filed by Interested Partys Century Indemnity Company, Pacific Indemnity Company, Westchester Fire Insurance Company
10	04/04/2024	572	Joinder in Ex Parte Application of Certain Insurers for Entry of an Order Pursuant to Bankruptcy Rule 2004 Compelling Production
11	04/04/2024	573	Committee's Opposition to Ex Parte Application of Certain Insurers for Entry of an Order Pursuant to Bankruptcy Rule 2004 Compelling Production
12	04/08/2024	580	Objection Debtor's Request for Hearing and Opposition to Ex Parte Application of Certain Insurers for Entry of an Order Pursuant to Bankruptcy Rule 2004 Compelling Production of Documents
13	04/17/2024	591	Status Report of Certain Insurers in Connection with their Application for Entry of an Order Pursuant to Bankruptcy Rule 2004 Compelling Production of Documents
14	04/19/2024	604	Response to Declaration of Joseph J. Passarello in Support of Chapter 11 Petition and Debtors Emergency Motions
15	05/16/2024	635	Motion for Entry of an Order Referring Parties to Global Mediation, Appointing Mediator and Granting Related Relief

16	5/30/2024	668	Insurers' Objection to Debtor's Motion for Entry of an Order Referring Parties to Global Mediation, Appointing Mediator, and Granting Related Relief
17	06/06/2024	683	Committee's Reply in Support of Debtors Motion for Entry of an Order Referring Parties to Global Mediation, Appointing Mediator and Grant Related Relief
18	06/06/2024	686	Omnibus Reply in Support of Motion for Entry of an Order Referring Parties to Global Mediation, Appointing Mediator and Granting Related Relief
19	06/18/2024	695	Transcript regarding Hearing Held 6/13/2024
20	06/20/2024	704	Memorandum Decision on Motion for Order Referring Parties to Global Mediation
21	07/15/2024	747	Order Referring Case to Mediation and Appointing Mediator
22	05/19/2025	1190	Letter to The Hon. Judge Dennis Montali re Discovery Dispute.
23	05/23/2025	1203	Response to Committee's Letter re Discovery Dispute
24	05/28/2025	1210	Order on Pending Discovery Dispute
25	07/10/2025	1233	Application for Compensation Fifth Interim Application of Pachulski Stang Ziehl & Jones LLP for Allowance and Payment of Compensation and Reimbursement of Expenses for the Period February 1, 2025 Through May 31, 2025
26	07/10/2025	1234	Declaration of Brittany M. Michael in Support of Fifth Interim Application of Pachulski Stang Ziehl & Jones LLP for Allowance and Payment of Compensation and Reimbursement of February 1, 2025 to May 31, 2025
27	07/10/2025	1236	Interim Application for Compensation of Burns Bair LLP for Allowance and Payment of Fees and Reimbursement of Expenses as Special Insurance Counsel for The Official Committee of Unsecured Creditors

28	07/10/2025	1237	Declaration of Jesse J. Bair in Support of Interim Application for Compensation of Burns Bair LLP for Allowance and Payment of Fees and Reimbursement of Expenses as Special Insurance Counsel for The Official Committee of Unsecured Creditors
29	07/10/2025	1239	Application for Compensation of Felderstein Fitzgerald Willoughby Pascuzzi & Rios LLP for Allowance of Fees and Reimbursement of Expenses as Bankruptcy Co-Counsel for the Debtor in Possession
30	07/10/2025	1240	Declaration of Paul J. Pascuzzi in Support of Felderstein Fitzgerald Willoughby Pascuzzi & Rios LLP Fifth Interim Application for Allowance of Fees and Reimbursement of Expenses as Bankruptcy Co-Counsel for the Debtor in Possession
31	07/10/2025	1245	Application for Compensation of Weintraub Tobin Chediak Coleman Grodin Law Corporation for Allowance of Fees and Reimbursement of Expenses as Special Litigation Counsel for The Roman Catholic Archbishop of San Francisco
32	07/10/2025	1246	Declaration of Paul E. Gaspari in Support of Weintraub Tobin Chediak Coleman Grodin Law Corporation Fifth Interim Application for Allowance of Fees and Reimbursement of Expenses as Special Litigation Counsel
33	07/10/2025	1251	Interim Application for Compensation Fifth Interim Fee Application of Sheppard, Mullin, Richter & Hampton LP, for Allowance and Payment of Compensation and Reimbursement of Expenses for the Period February 1, 2025 through May 31, 2025 for Sheppard, Mullin, Richter & Hampton LLP, Debtor's Attorney
34	07/10/2025	1252	Application for Compensation of Blank Rome LLP for Allowance of Fees and Reimbursement of Expenses as Special Insurance Counsel for the Debtor in Possession for The Roman Catholic Archbishop of San Francisco
35	07/10/2025	1253	Application for Compensation of Blank Rome LLP for Allowance of Fees and Reimbursement of

			Expenses as Special Insurance Counsel for the Debtor in Possession for The Roman Catholic Archbishop of San Francisco
36	07/21/2025	1266	Statement of Monthly Professional Fees of BlankRome LLP [June 2025]
37	07/21/2025	1267	Statement of Monthly Professional Fees and Expenses of Felderstein Fitzgerald Willoughby Pascuzzi & Rios LLP [June 2025]
38	07/21/2025	1269	Statement of Monthly Professional Fees for Weintraub Tobin [June 2025]
39	07/24/2025	1273	Statement of Monthly Professional Fee Statement for Sheppard, Mullin, Richter & Hampton LLP - June 2025
40	07/30/2025	1277	Statement of Monthly Professional Fee Statement For Burns Bair LLP (June 2025)
41	07/30/2025	1279	Statement of Monthly Professional Fee Statement for Pachulski Stang Ziehl & Jones LLP (June 2025)
42	08/20/2025	1295	Statement of Monthly Professional Fee Statement for Sheppard, Mullin, Richter & Hampton LLP - July 2025
43	08/20/2025	1297	Statement of Monthly Professional Fees for BlankRome LLP [July 2025]
44	08/20/2025	1298	Statement of Monthly Professional Fees and Expenses for Felderstein Fitzgerald Willoughby Pascuzzi & Rios LLP [July 2025]
45	08/20/2025	1299	Statement of Monthly Professional Fees and Expenses for Weintraub Tobin [July 2025]
46	09/02/2025	1319	Statement of Monthly Professional Fee Statement For Burns Bair LLP (July 2025)
47	09/09/2025	1329	Statement of Monthly Professional Fee Statement for Pachulski Stang Ziehl & Jones LLP (July 2025)
48	09/30/2025	1363	The Official Committee of Unsecured Creditors' Opposition to Insurers' Motion for Stay Pending Appeal

49	09/30/2025	1368	Opposition to Insurer's Motion for Stay Pending Appeal
50	10/08/2025	1389	Complaint by Westport Insurance Corporation f/k/a Employers Reinsurance Corporation against The Roman Catholic Archbishop of San Francisco
51	10/09/2025	1392	Order Denying Motion for Stay Pending Appeal

III. Reservation of Rights

Appellee reserves the right to withdraw, supplement, amend or modify this designation of record on appeal. This filing is made expressly subject to, and without waiver of any and all rights, remedies, challenges, and objections.

Dated: October 14, 2025

PACHULSKI STANG ZIEHL & JONES LLP

By /s/ Gail S. Greenwood

James I. Stang

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-- and --

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